



State of Idaho
Department of Environmental Quality
Air Quality Division

**AIR QUALITY PERMIT
STATEMENT OF BASIS**

Permit to Construct No. P-2008.0042

Final

MAACO Collision Repair and Auto Painting

3236 East Amity Road

Boise, Idaho

Facility ID No. 001-00223

July 22, 2008

Morrie Lewis

Permit Writer

A handwritten signature in black ink, appearing to read "ML", written over the printed name "Morrie Lewis".

The purpose of this Statement of Basis is to satisfy the requirements of IDAPA 58.01.01.200, Rules for the Control of Air Pollution in Idaho, for issuing air permits.

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Acronyms, Units, and Chemical Nomenclature

AAC	acceptable ambient concentrations for non-carcinogens
AFS	AIRS Facility Subsystem
AIRS	Aerometric Information Retrieval System
cfm	cubic feet per minute
CFR	Code of Federal Regulations
CO	carbon monoxide
DEQ	Department of Environmental Quality
EL	screening emission levels
EPA	U.S. Environmental Protection Agency
gal/day	gallons per calendar day
gal/hr	gallons per hour
gal/yr	gallons per consecutive 12-calendar month period
HAP	hazardous air pollutants
hr/day	hours per calendar day
hr/yr	hours per consecutive 12-calendar month period
ID No.	identification number
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
lb/gal	pounds per gallon
lb/hr	pounds per hour
MACT	Maximum Achievable Control Technology
MSDS	Material Safety Data Sheets
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO _x	nitrogen oxides
NSPS	New Source Performance Standards
PM	particulate matter
PM ₁₀	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
PSD	Prevention of Significant Deterioration
PTC	permit to construct
Rules	Rules for the Control of Air Pollution in Idaho
SIC	Standard Industrial Classification
SIP	State Implementation Plan
SM80	synthetic minor facility with emissions greater than or equal to 80% of a major source threshold
SO ₂	sulfur dioxide
TAP	toxic air pollutants
T/yr	tons per consecutive 12-calendar month period
VOC	volatile organic compounds

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Permittee:	MAACO Collision Repair and Auto Painting	Permit No.: P-2008.0011
Location:	Boise, Idaho	Facility ID No. 005-00057

1. FACILITY DESCRIPTION

J.R. Leonard Inc. doing business as MAACO Collision Repair and Auto Painting is an auto body repair and refinishing shop with a paint spray booth and drying enclosure. The paint booth is a pressurized semi-downdraft booth with glass fiber filtration media for control of particulate emissions. Drying and paint curing is done in the recirculation gas-fired oven. The booth and oven each contain a natural gas-fired burner. The coating operations are designed to accommodate painting of up to twelve vehicles per day. The process includes application of coatings via a single high-efficiency gravity feed gun. All operations occur at ambient pressure. Maximum drying temperature is 160°F. A totally-enclosed gun washer will be used for cleanup.

2. APPLICATION SCOPE

This is an initial PTC for an auto body repair and refinishing shop.

2.1 Application Chronology

March 18, 2008	PTC application was received.
March 19, 2008	\$1,000 PTC application fee was received.
April 1 through April 15, 2008	Opportunity for a public comment period was held. No comment or request for a public comment period was received.
March 28, 2008	Application was determined incomplete.
May 12, 2008	Supplemental information was received.
June 9, 2008	Application was determined complete.
June 17, 2008	Draft permit and statement of basis were sent for peer and Boise Regional Office (BRO) review.
June 26, 2008	Draft permit and statement of basis were sent to the facility for review.
July 8, 2008	\$5,000 PTC processing fee was received.
July 18, 2008	Final permit and statement of basis were issued.

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3. TECHNICAL ANALYSIS

Table 3.1 EMISSION UNIT AND CONTROL DEVICE INFORMATION

Permit Section	Source Description	Emissions Control
2	<u>Coating operations</u>	
	<u>Drying oven and enclosure</u>	
	Manufacturer:	Garmat
	Model:	Tier I, recirculation gas-fired
	Maximum capacity:	997,000 Btu/hr
	Maximum operation:	8,760 hr/yr
	Fuel types:	natural gas
	Fuel consumption:	978 scf/hr
	<u>Paint spray booth</u>	
	Manufacturer:	Garmat
Model:	Tier 1, semi-down draft	
Maximum capacity:	10,000 cfm	
<u>Spray gun</u>		
Manufacturer:	Devilbiss or equivalent	
Model:	GFG-670, gravity-feed	
Maximum capacity:	3.75 gal/hr	
Maximum operation:	12 hr/day 5,000 gal/yr	
<u>Spray gun washer</u>		
Manufacturer:	Hercules or equivalent	
Model:	G200, totally-enclosed	
		<u>Spray booth filter system</u>
		Manufacturer: Superior Glass Fibers or equivalent
		Model: PA-21
		PM ₁₀ control efficiency: >98%

3.1 Emissions Inventory

An emissions inventory, including emissions of federally-regulated hazardous air pollutants (HAP) and state-regulated toxic air pollutants (TAP), was provided in the PTC application. The emissions inventory has been reviewed by DEQ and appears to accurately reflect the emissions from the facility.

A summary of the uncontrolled and controlled emissions of criteria pollutants is shown in Table 3.3 and Table 3.4, respectively. Emissions from coating materials at the facility, including solvents, paints, thinners, and cleaning materials, were estimated based on information included in the application, including the manufacturer's formulation data (MSDS). Uncontrolled emissions are based on the maximum capacity of the spray gun (3.75 gal/hr) operating at 24 hours/day without particulate filtration. Controlled emissions include the proposed daily (12 hr/day) operating schedule; the proposed daily usage limits (gal/day) for Pre-treatment Wash Primer, Ful-Thane 2K Urethane, Ful-Base Topcoat, and Ful-Cryl II Acrylic Enamel; and the proposed annual usage limit (gal/yr) for the total of all coating materials.

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Table 3.2 COATING MATERIAL FORMULATIONS

Coating Material	Volumetric Ratio	Manufacturer Product Number (MSDS)
Ful-Base Topcoat	8/3 parts	430-XX ¹
	16/3 parts	435-90
	1 part	483-08
	2 parts	441-XX ¹
Ful-Cryl II Acrylic Enamel	8/3 parts	430-XX ¹
	16/3 parts	435-94
	1 part	483-11
	2 parts	441-XX ¹
Ful-Thane 2K Urethane	8/3 parts	430-XX ¹
	16/3 parts	435-91
	1 part	483-15
	2 parts	441-XX ¹
Chromabase Basecoat / Clearcoat	1/16 part	814J
	1/16 part	806J
	2/16 part	811J
	2/16 part	827J
	2/16 part	820J
	2/16 part	802J
	6/16 part	150K
	1 part	7160S
	16 parts	496-00
Pretreatment Wash Primer	4 parts	483-79
	1 part	491-17
Prime Sealer	1 part	441-XX ¹
	1 part	422-XX ¹
Primer Surface	1 part	421-XX ¹
	1 part	483-87
Chromabase Basecoat	1/16 part	814J
	1/16 part	806J
	2/16 part	811J
	2/16 part	827J
	2/16 part	820J
	2/16 part	802J
	6/16 part	150K
1 part	7160S	
Wash Thinner	1 part	481-16

¹ "XX" indicates that any product in the specified product series may be used.

A conservative approach was used, in which all of the VOC and HAP within the coating materials were assumed to be 100% emitted. PM₁₀ emissions were calculated based on the solids content of the coating materials, paint overspray of 35% (transfer efficiency of 65%) and the manufacturer's control efficiency rating of greater than 98% control of particulate matter greater than 5 microns (conservatively assumed

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to be equivalent in control efficiency for PM₁₀ emissions). Emissions were calculated based on coatings sprayed in the specific volumetric proportions listed in Table 3.2, assuming that the worst-case coating material for each regulated pollutant was used for the entire operating schedule (e.g., the highest solids content coating was sprayed 12 hr/day and 5,000 gal/yr for PM₁₀ daily and annual emissions estimates; the highest n-butyl alcohol content coating was sprayed 12 hr/day for calculation of n-butyl alcohol emissions; etc.). For instances in which an entire series of coating materials was evaluated, denoted with an "XX" in Table 3.2, an average density across the product series and the highest TAP content across the product series was used in the development of the emissions inventory. In these instances any product within the series may be used (e.g., for 430-XX, 430-52 may be used, or any other paint within the 430 product series).

Table 3.3 EMISSIONS ESTIMATES OF CRITERIA POLLUTANTS – UNCONTROLLED EMISSIONS

Emissions Unit	PM ₁₀		SO ₂		NO _x		CO		VOC		LEAD
	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/quarter
Paint spray booth ^a		45.81								113.33	
Oven ^a		0.07		0.01		0.82		0.35		0.05	1.07E-03
Total, Point Sources		45.88		0.01		0.82		0.35		113.38	1.07E-03

^aBased on unlimited hours of operation at 8,760 hours per year, and the maximum capacity of the equipment (3.75 gal/hr for the spray gun and 997,000 Btu/hr natural gas usage for the oven).

Table 3.4 EMISSIONS ESTIMATES OF CRITERIA POLLUTANTS – CONTROLLED EMISSIONS

Emissions Unit	PM ₁₀ ^c		SO ₂		NO _x		CO		VOC		LEAD
	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/quarter
Paint spray booth ^b	0.21	0.14							25.88	17.25	
Oven ^a	0.02	0.07	0.0012	0.005	0.19	0.82	0.08	0.35	0.01	0.05	1.07E-03
Total, Point Sources	0.23	0.21	0.01	0.01	0.19	0.82	0.08	0.35	25.9	17.3	1.07E-03

^aBased on unlimited hours of operation at 8,760 hours per year, and the maximum capacity of the equipment (997,000 Btu/hr natural gas usage for the oven).

^bBased on the proposed operating schedule of 12 hr/day, the total usage of all coating materials limited to 5,000 gal/yr, and the daily usage rate limits for the Pre-treatment Wash Primer, Ful-Thane 2K Urethane, Ful-Base Topcoat, and Ful-Cryl II Acrylic Enamel.

^cBased on a filter PM₁₀ control efficiency of 98% and a 65% transfer efficiency (35% overspray).

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Table 3.5 TAP EXCEEDING EL AND HAP EMISSIONS SUMMARY

TAP	HAP	Screening Emission Levels (EL)	Uncontrolled 24-hour Average	Controlled 24-hour Average ¹	Controlled Annual ¹
		lb/hr	lb/hr	lb/hr	T/yr
Ethyl Benzene	Ethyl Benzene	29	2.60		1.73
Hexamethyl Diisocyanate	Hexamethyl Diisocyanate	0.002	0.006	0.002	0.004
Isophorone Diisocyanate		0.006	0.011	0.003	
Methanol		17.3	5.09		
Methyl Isobutyl Ketone	Methyl Isobutyl Ketone	13.7	1.88		1.25
Naphthalene	Naphthalene	3.33	2.07		1.38
n-Butyl Alcohol	n-Butyl Alcohol	10	11.85	1.59	7.91
n-Hexane	n-Hexane	12	0.10		0.07
Phosphoric Acid	Phosphoric Acid	0.067	0.33	0.043	0.22
Toluene	Toluene	25	7.63		5.09
Silica, silicon dioxide		0.667	1.82	0.454	
Xylene	Xylene	29	9.35		6.24
Trimethylbenzene (mixed and individual isomers)	1,2,4-Trimethylbenzene	8.2 ²	0.427		0.29
TOTAL HAP					24.19
INDIVIDUAL HAP					7.91

¹ Based on the proposed operating schedule of 12 hr/day, the total usage of all coating materials limited to 5,000 gal/yr, and the daily usage rate limits for the Pre-treatment Wash Primer, Ful-Thane 2K Urethane, Ful-Base Topcoat, and Ful-Cryl II Acrylic Enamel.

² The screening emission level for trimethyl benzene applies to mixed and individual isomers (including the combined emissions of 1,2,4-Trimethylbenzene and 1,3,5-Trimethylbenzene).

None of the controlled emissions exceeded the applicable major source thresholds for criteria pollutants or for HAP (individual or combined thresholds). A detailed emissions inventory for this facility is included in Appendix B.

3.2 Ambient Air Quality Impact Analysis

The facility has demonstrated compliance to DEQ's satisfaction that emissions from this facility will not cause or significantly contribute to a violation of any ambient air quality standard. The facility has also demonstrated compliance to DEQ's satisfaction that the emissions increase due to this permitting action will not exceed any acceptable ambient concentration (AAC) or acceptable ambient concentration for carcinogens (AACC) for toxic air pollutants (TAP).

Based on the emissions inventory, the potential emission rates of TAP and criteria pollutants from all emission sources were below the corresponding screening emission levels and DEQ modeling thresholds established in IDAPA 58.01.01.585 and 586 and in the State of Idaho Air Quality Modeling Guideline¹. Compliance with the TAP increments for hexamethyl diisocyanate, n-butyl alcohol, isophorone diisocyanate, and phosphoric acid were demonstrated using the controlled ambient concentration in accordance with IDAPA 58.01.01.210.08. Modeling conducted in the development of TAP rules indicates that if a controlled emission rate is below the applicable EL, controlled ambient concentrations are expected to be below the AAC or AACC. The controlled TAP emissions rates that were compared to the EL assumed the use of operational limitations, including operating hours and material usage limits (refer to Section 3.1 for additional information).

¹ Table 1, State of Idaho Air Quality Modeling Guideline, Doc ID AQ-011, rev. 1, December 31, 2002.

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Because coating material emission rates were based directly on the maximum weight percent of each TAP and VOC listed in the material safety data sheets (MSDS) submitted with the application, any change in MSDS information that could result in the emission of a new TAP or could result in an increase in any TAP emission would require a permit modification. This requirement has been included in Permit Condition 2.7.

A detailed emissions inventory for this facility, including a comparison of emission rates and limits to the applicable EL, is included in Appendix B.

4. REGULATORY REVIEW

4.1 Attainment Designation (40 CFR 81.313)

The facility is located in Ada County, which is designated as attainment for PM₁₀ and CO and as unclassifiable for PM_{2.5}, NO₂, SO_x, and Ozone.

4.2 Permit to Construct (IDAPA 58.01.01.201)

The facility's project does not meet the permit to construct exemption criteria contained in Sections 220 through 223 of the Rules. Therefore, a PTC is required.

4.3 Title V Classification (IDAPA 58.01.01.300, 40 CFR Part 70)

The facility is classified as a synthetic minor facility, because without limits on the potential to emit, VOC and HAP emissions have the potential to exceed major source thresholds. The facility is not classified as a major facility for Tier I permitting purposes, in accordance with IDAPA 58.01.01.008.10. The facility is not a designated facility as defined in IDAPA 58.01.01.006.30.

Individual and total HAP annual emission limits (Permit Condition 2.3), as well as the total annual usage limit of all coating materials (Permit Condition 2.6), are considered synthetic minor limits used to demonstrate compliance with major source thresholds for HAP (10 T/yr for individual HAP and 25 T/yr for combined HAP) and for VOC. Because HAP and VOC emissions result directly from the amount of coating materials used and are based on the coating material formulation limits (Permit Condition 2.7), VOC emissions are effectively limited below the major source threshold.

4.4 PSD Classification (40 CFR 52.21)

The facility is classified as a PSD minor facility, because the uncontrolled potential to emit is estimated below PSD major source thresholds.

4.5 NSPS Applicability (40 CFR 60)

The facility is not subject to NSPS.

4.6 NESHAP Applicability (40 CFR 61)

The facility is not subject to NESHAP in 40 CFR 61.

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4.7 MACT Applicability (40 CFR 63)

The facility has proposed to operate as a minor source of hazardous air pollutant (HAP) emissions, and is subject to the requirements of 40 CFR 63, Subpart HHHHHH for area sources.

40 CFR 63, Subpart HHHHHH..... National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources.

40 CFR 63.11169 What is the purpose of this subpart?

In accordance with §63.11169, subpart HHHHHH establishes national emission standards for hazardous air pollutants (HAP) for area sources involved in auto body refinishing operations that encompass motor vehicle and mobile equipment spray-applied surface coating operations.

40 CFR 63.11170 Am I subject to this subpart?

In accordance with §63.11170(a), the permittee is subject to this subpart because the facility will be operated as an area source of HAP. The facility is a source of HAP that is not a major source of HAP, is not located at a major source, and is not part of a major source of HAP emissions. In addition, the facility will perform one or more activities listed in this section, including spray application of coatings, as defined in §63.11180, to motor vehicles and mobile equipment including operations that are located in stationary structures at fixed locations.

40 CFR 63.11171 How do I know if my source is considered a new source or an existing source?

In accordance with §63.11171(b), the affected source is the collection of mixing rooms and equipment; spray booths, curing ovens, and associated equipment; spray guns and associated equipment; spray gun cleaning equipment; and equipment used for storage, handling, recovery, or recycling of cleaning solvent or waste paint. Paint stripping was not proposed as a business activity.

In accordance with §63.11171(c), the affected source is a new source because it commenced construction after September 17, 2007, by installing new paint stripping or surface coating equipment, and the new surface coating equipment will be used at a source that was not actively engaged in paint stripping and/or miscellaneous surface coating prior to September 17, 2007.

40 CFR 63.11172 When do I have to comply with this subpart?

In accordance with §63.11172(a)(2), because the initial startup of the facility will occur after January 9, 2008, the compliance date is the date of initial startup of the affected source.

40 CFR 63.11173 What are my general requirements for complying with this subpart?

Because the facility has not proposed paint-stripping activities, the requirements of §63.11173(a) through (f) are not applicable. Because the facility is a motor vehicle surface coating operation, in accordance with §63.11173(e), the permittee must meet the requirements of in paragraphs (e)(1) through (e)(5) of this section.

In accordance with §63.11173(f), each owner or operator of an affected miscellaneous surface coating source must ensure and certify that all new and existing personnel, including contract personnel, who spray apply surface coatings, as defined in §63.11180, are trained in the proper application of surface

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coatings as required by paragraph (e)(1) of this section. The training program must include, at a minimum, the items listed in paragraphs (f)(1) through (f)(3) of this section.

In accordance with §63.11173(g), as required by paragraph (e)(1) of this section, all new and existing personnel at an affected motor vehicle and mobile equipment or miscellaneous surface coating source, including contract personnel, who spray apply surface coatings, as defined in §63.11180, must be trained by the dates specified in paragraphs (g)(1) and (2) of this section. Employees who transfer within a company to a position as a painter are subject to the same requirements as a new hire.

Permit Condition 2.10 includes the requirements of this section.

40 CFR 63.11174 What parts of the General Provisions apply to me?

In accordance with §63.11174(a), Table 1 of this subpart shows which parts of the General Provisions in subpart A apply. Permit Condition 2.10 includes the requirements of this section.

In accordance with §63.11174(b), an owner or operator of an area source subject to this subpart is exempt from the obligation to obtain a permit under 40 CFR part 70 or 71 provided that a permit under 40 CFR 70.3(a) or 71.3(a) is not required for a reason other than becoming area source subject to this subpart. This permit application and permitting action involve a Permit to Construct, and will not utilize the requirements and procedures in IDAPA 58.01.01.300-399 for the issuance of Tier I operating permits.

40 CFR 63.11175 What notifications must I submit?

In accordance with §63.11175(a), because the facility is a surface coating operation subject to this subpart, the initial notification required by §63.9(b) must be submitted. For a new affected source, the Initial Notification must be submitted no later than 180 days after initial startup or July 7, 2008, whichever is later.

In accordance with §63.11175(b), because the facility is a new source, the permittee is not required to submit a separate notification of compliance status in addition to the initial notification specified in paragraph (a) of this subpart provided the permittee was able to certify compliance on the date of the initial notification, as part of the initial notification, and the permittee's compliance status has not since changed. The permittee must submit a Notification of Compliance Status on or before March 11, 2011. The permittee is required to submit the information specified in paragraphs (b)(1) through (4) of this section with the Notification of Compliance Status.

Permit Condition 2.15 includes the requirements of this section.

40 CFR 63.11176 What reports must I submit?

In accordance with §63.11176(a), because the permittee is an owner or operator of a paint stripping, motor vehicle or mobile equipment, or miscellaneous surface coating affected source, the permittee is required to submit a report in each calendar year in which information previously submitted in either the initial notification required by §63.11175(a), Notification of Compliance, or a previous annual notification of changes report submitted under this paragraph, has changed. Deviations from the relevant requirements in §63.11173(a) through (d) or §63.11173(e) through (g) on the date of the report will be deemed to be a change. The annual notification of changes report must be submitted prior to March 1 of each calendar year when reportable changes have occurred and must include the information specified

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in paragraphs (a)(1) through (2) of this section. Permit Condition 2.16 includes the requirements of this section.

Because the facility has not proposed to conduct paint stripping operations, the MeCl minimization plan requirements are not applicable.

40 CFR 63.11177 What records must I keep?

In accordance with §63.11177, because the permittee is the owner or operator of a surface coating operation, the permittee must keep the records specified in paragraphs (a) through (d) and (g) of this section. Because the permittee has not proposed to conduct paint stripping operations, the requirements of paragraphs (e) and (f) of this section are not applicable. Permit Condition 2.14 includes the requirements of this section.

40 CFR 63.11178 In what form and for how long must I keep my records?

In accordance with 40 CFR 63.11178(a) because the permittee is the owner or operator of an affected source, the permittee must maintain copies of the records specified in §63.11177 for a period of at least five years after the date of each record. Copies of records must be kept on site and in a printed or electronic form that is readily accessible for inspection for at least the first two years after their date, and may be kept off-site after that two year period. Permit Condition 2.14 includes the requirements of this section.

40 CFR 63.11179 Who implements and enforces this subpart?

In accordance with §63.11179(a), this subpart can be implemented and enforced by the U.S. Environmental Protection Agency (EPA), or a delegated authority. At the time of this permitting action, the EPA had not delegated authority to the State of Idaho.

40 CFR 63.11180 What definitions do I need to know?

Terms used in this subpart are defined in accordance with §63.11180.

4.8 CAM Applicability (40 CFR 64)

The facility is a synthetic minor source, and is therefore not subject to CAM.

4.9 Permit Conditions Review

This section describes the permit conditions for this initial permit.

Permit Conditions 1.1, 1.2, 1.3, 2.1, and 2.2

These permit conditions provide a description of the purpose of the permit and the regulated sources, the process, and the control devices used at the facility.

Permit Condition 2.3

The total emissions from coating operations shall not exceed any corresponding emission rate limit listed in Table 2.1.

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Table 2.1 COATING OPERATIONS EMISSIONS LIMITS¹

Process Description	Individual HAP	Total HAP
	T/yr ²	T/yr ²
Coating operations	9.49	24.49

¹ In the absence of any other creditable evidence, compliance is assured by complying with the operating, monitoring, and recordkeeping requirements of this permit.

² Tons per consecutive 12-calendar month period.

This permit condition limits the annual individual and combined HAP emissions (T/yr). The annual HAP limits are considered synthetic minor limits. Refer to Section 4.3 for additional information.

Permit Condition 2.4

The permittee shall not allow, suffer, cause, or permit the emission of odorous gases, liquids, or solids into the atmosphere of such nature and duration and under such conditions as would be injurious to human health or welfare, to animal or plant life, or to property, or to interfere unreasonably with the enjoyment of life or property in accordance with IDAPA 58.01.01.776.

This permit condition limits the emission of odors in accordance with IDAPA 58.01.01.776.

Permit Condition 2.5

The spray gun operating hours shall not exceed 12 hours per calendar day.

This permit condition limits the spray gun hours of operation. These limits are based on the hours of operation proposed in the application, and are required to limit coating TAP emissions to below EL thresholds.

Permit Condition 2.6

Coating material usage rates at the facility shall not exceed the usage rates listed in Table 2.2, to demonstrate compliance with Permit Condition 2.3.

Table 2.2 COATING MATERIAL USAGE LIMITS

Coating Material	Material Usage Rate	
	gal/day ¹	gal/yr ²
Pre-treatment Wash Primer	12	
Ful-Thane 2K Urethane	24	
Ful-Base Topcoat	24	
Ful-Cryl II Acrylic Enamel	36	
Total of all coating materials ³		5,000

¹ Gallons per calendar day.

² Gallons per consecutive 12-calendar month period.

³ The total of all coating materials used, including coatings, solvents, thinners, additives, and cleaning materials.

This permit condition limits the material usage rates of coating materials, which are based on the usage rates proposed in the application. The daily usage rates of Ful-Thane 2K Urethane and Ful-Cryl II Acrylic Enamel are limited to demonstrate compliance with the EL threshold for hexamethyl diisocyanate (HDI). The usage rate of Pre-treatment Wash Primer is limited to demonstrate compliance with the EL thresholds for n-butyl alcohol and phosphoric acid. The usage rate of Ful-Base Topcoat is limited to demonstrate compliance with the EL threshold for isophorone diisocyanate. The combination of all coating materials used is limited to demonstrate compliance with the individual and combined

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HAP major source thresholds, which are considered synthetic minor limitations. Refer to Section 4.3 for additional information.

Permit Condition 2.7

The permittee shall use only the coating materials listed in Table 2.3 as raw materials, in the volumetric ratios listed. Any changes in raw materials or coating material formulations at the facility which are not included in Table 2.3 may require a permit to construct in accordance with IDAPA 58.01.01.201 unless the source is exempted in accordance with the procedures of IDAPA 58.01.01.220-223.

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Table 2.3 COATING MATERIAL FORMULATIONS

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Ful-Base Topcoat	8/3 parts	430-XX ¹
	16/3 parts	435-90
	1 part	483-08
	2 parts	441-XX ¹
Ful-Cryl II Acrylic Enamel	8/3 parts	430-XX ¹
	16/3 parts	435-94
	1 part	483-11
	2 parts	441-XX ¹
Ful-Thane 2K Urethane	8/3 parts	430-XX ¹
	16/3 parts	435-91
	1 part	483-15
	2 parts	441-XX ¹
Chromabase Basecoat / Clearcoat	1/16 part	814J
	1/16 part	806J
	2/16 part	811J
	2/16 part	827J
	2/16 part	820J
	2/16 part	802J
	6/16 part	150K
	1 part	7160S
	16 parts	496-00
Pretreatment Wash Primer	4 parts	483-79
	1 part	491-17
Prime Sealer	1 part	441-XX ¹
		422-XX ¹
Primer Surface	1 part	421-XX ¹
	1 part	483-87
Chromabase Basecoat	1/16 part	814J
	1/16 part	806J
	2/16 part	811J
	2/16 part	827J
	2/16 part	820J
	2/16 part	802J
	6/16 part	150K
Wash Thinner	1 part	7160S
		481-16

¹ "XX" indicates that any product in the specified product series may be used.

These limits are based on the coating materials used in the development of the emissions inventory. Emissions were estimated based on the specific coating materials listed, using the specific volumetric ratios and MSDS information provided in the application.

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Permit Condition 2.8

- The permittee shall install, maintain, and operate according to the manufacturer's specifications and recommendations, a spray booth filter system with a minimum 98% capture efficiency for PM₁₀.
- The permittee shall install, maintain, and operate according to the manufacturer's specifications and recommendations, a spray gun with a minimum 65% transfer efficiency.
- The permittee shall not operate the spray gun unless the spray booth filter system is installed and operating.

These requirements are based on the assumptions used in the development of the emissions inventory submitted with the application, including the use of a spray booth filter system with a 98% capture efficiency for PM₁₀, a spray gun with a minimum transfer efficiency of 65% (overspray of 35%), and that the spray booth filter system would be used during coating operations.

Permit Condition 2.9

- The permittee shall install, calibrate, maintain, and operate according to the manufacturer's specifications and recommendations, a pressure drop monitoring device to measure the pressure drop across the spray booth filter system.
- The pressure drop across the spray booth filter system shall be maintained within 0.04 and 0.51 inches of water.

These requirements are based on the filter test report data provided with the application establishing the operating range of the spray booth filter system pressure drop required to achieve a PM₁₀ removal efficiency of 98%.

Permit Condition 2.10

In accordance with 40 CFR 63.11172(a)(2), on and after the date of initial startup of the affected source the permittee shall comply with the applicable emission limitations and requirements of the National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, 40 CFR 63, Subpart HHHHHH.

- The permittee shall meet the requirements of 40 CFR 63.11173(e)(1). All painters must be certified that they have completed training in the proper spray application of surface coatings and the proper setup and maintenance of spray equipment. The minimum requirements for training and certification are described in 40 CFR 63.11173(f). The spray application of surface coatings is prohibited by persons who are not certified as having completed the training described in 40 CFR 63.11173(f).
- All spray-applied coatings must be applied in a spray booth, preparation station, or mobile enclosure that meets the requirements of 40 CFR 63.11173(e)(2).
 - All spray booths, preparation stations, and mobile enclosures must be fitted with a type of filter technology that is demonstrated to achieve at least 98-percent capture of paint overspray. The procedure used to demonstrate filter efficiency must be consistent with the American Society of Heating, Refrigerating, and Air-Conditioning Engineers (ASHRAE) Method 52.1.
 - Spray booths and preparation stations used to refinish complete motor vehicles or mobile equipment must be fully enclosed with a full roof, and four complete walls or complete side curtains, and must be ventilated at negative pressure so that air is drawn into any openings in the booth walls or preparation station curtains. However, if a spray booth is fully enclosed and has

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seals on all doors and other openings and has an automatic pressure balancing system, it may be operated at up to, but not more than, 0.05 inches water gauge positive pressure.

- Spray booths and preparation stations that are used to coat miscellaneous parts and products or vehicle subassemblies must have a full roof, at least three complete walls or complete side curtains, and must be ventilated so that air is drawn into the booth. The walls and roof of a booth may have openings, if needed, to allow for conveyors and parts to pass through the booth during the coating process.
- All spray-applied coatings must be applied with a high volume, low pressure (HVLV) spray gun, electrostatic application, airless spray gun, or air-assisted airless spray gun, in accordance with 40 CFR 63.11173(e)(3).
- All paint spray gun cleaning must be done so that an atomized mist or spray of gun cleaning solvent and paint residue is not created outside of a container that collects used gun cleaning solvent, in accordance with 40 CFR 63.11173(e)(4). Spray gun cleaning may be done by using a fully enclosed spray gun washer.
- Each owner or operator must ensure and certify that all new and existing personnel, including contract personnel, who spray apply surface coatings, as defined in 40 CFR 63.11180, are trained in the proper application of surface coatings as required by 40 CFR 63.11173(e)(1), in accordance with 40 CFR 63.11173(f). The training program must include, at a minimum:
 - A list of all current personnel by name and job description who are required to be trained;
 - Hands-on and classroom instruction that addresses, at a minimum, initial and refresher training in the following topics:

Spray gun equipment selection, set up, and operation, including measuring coating viscosity, selecting the proper fluid tip or nozzle, and achieving the proper spray pattern, air pressure and volume, and fluid delivery rate;

Spray technique for different types of coatings to improve transfer efficiency and minimize coating usage and overspray, including maintaining the correct spray gun distance and angle to the part, using proper banding and overlap, and reducing lead and lag spraying at the beginning and end of each stroke;

Routine spray booth and filter maintenance, including filter selection and installation; and

Environmental compliance with the requirements of 40 CFR 63, Subpart HHHHHH.
 - A description of the methods to be used at the completion of initial or refresher training to demonstrate, document, and provide certification of successful completion of the required training.
- All new and existing personnel at the facility, including contract personnel, who spray apply surface coatings, as defined in 40 CFR 63.11180, must be trained by the dates specified in 40 CFR 63.11173(g). Employees who transfer within a company to a position as a painter are subject to the same requirements as a new hire.
 - All personnel must be trained and certified no later than 180 days after hiring. Painter training that was completed within five years prior to the date training is required, and that meets the requirements specified in 40 CFR 63.11173(f)(2) of this section satisfies this requirement and is valid for a period not to exceed five years after the date the training is completed.

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- Training and certification will be valid for a period not to exceed five years after the date the training is completed, and all personnel must receive refresher training that meets the requirements of this section and be re-certified every five years.
- The parts of the General Provisions which apply to the permittee are specified in Table 4.2, in accordance with 40 CFR 63.11174(a).

Table 4.2 APPLICABILITY OF GENERAL PROVISIONS TO SUBPART HHHHHH OF PART 63

Citation	Subject	Explanation
40 CFR 63.1(a)(1)-(12)	General Applicability	
40 CFR 63.1(b)(1)-(3)	Initial Applicability Determination	Applicability of subpart HHHHHH is also specified in 40 CFR 63.11170.
40 CFR 63.1(c)(1)	Applicability After Standard Established	
40 CFR 63.1(c)(2)	Applicability of Permit Program for Area Sources	
40 CFR 63.1(c)(5)	Notifications	
40 CFR 63.2	Definitions	Additional definitions are specified in 40 CFR 63.11180.
40 CFR 63.3(a)-(c)	Units and Abbreviations	
40 CFR 63.4(a)(1)-(5)	Prohibited Activities	
40 CFR 63.4(b)-(c)	Circumvention/Fragmentation	
40 CFR 63.6(a)	Compliance With Standards and Maintenance Requirements—Applicability	
40 CFR 63.6(b)(1)-(7)	Compliance Dates for New and Reconstructed Sources	40 CFR 63.11172 specifies the compliance dates.
40 CFR 63.6(c)(1)-(5)	Compliance Dates for Existing Sources	40 CFR 63.11172 specifies the compliance dates.
40 CFR 63.6(e)(1)-(2)	Operation and Maintenance	
40 CFR 63.6(f)(1)	Compliance Except During Startup, Shutdown, and Malfunction	
40 CFR 63.6(f)(2)-(3)	Methods for Determining Compliance	
40 CFR 63.6(g)(1)-(3)	Use of an Alternative Standard	
40 CFR 63.6(i)(1)-(16)	Extension of Compliance	
40 CFR 63.6(j)	Presidential Compliance Exemption	
40 CFR 63.9(a)-(d)	Notification Requirements	40 CFR 63.11175 specifies notification requirements.
40 CFR 63.9(i)	Adjustment of Submittal Deadlines	
40 CFR 63.9(j)	Change in Previous Information	40 CFR 63.11176(a) specifies the dates for submitting the notification of changes report.
40 CFR 63.10(a)	Recordkeeping/Reporting—Applicability and General Information	
40 CFR 63.10(b)(1)	General Recordkeeping Requirements	Additional requirements are specified in 40 CFR 63.11177.
40 CFR 63.10(b)(2)(xii)	Waiver of recordkeeping requirements	
40 CFR 63.10(b)(2)(xiv)	Records supporting notifications	
40 CFR 63.10(b)(3)	Recordkeeping Requirements for Applicability Determinations	
40 CFR 63.10(d)(1)	General Reporting Requirements	Additional requirements are specified in 40 CFR 63.11176.
40 CFR 63.10(d)(4)	Progress Reports for Sources With Compliance Extensions	
40 CFR 63.10(f)	Recordkeeping/Reporting Waiver	
40 CFR 63.12	State Authority and Delegations	
40 CFR 63.13	Addresses of State Air Pollution Control Agencies and EPA Regional Offices	
40 CFR 63.14	Incorporation by Reference	Test methods for measuring paint booth filter

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		efficiency and spray gun transfer efficiency in 40 CFR 63.11173(e)(2) and (3) are incorporated and included in 40 CFR 63.14.
40 CFR 63.15	Availability of Information/Confidentiality	
40 CFR 63.16(a)	Performance Track Provisions—reduced reporting	

These requirements are specified in 40 CFR 63, Subpart HHHHHH. Refer to Section 4.7 for additional information.

Permit Condition 2.11

The permittee shall collect and maintain records of the following information on a daily basis to demonstrate compliance with Permit Conditions 2.5 and 2.6.

- The operating hours of the spray gun, in hours per calendar day.
- The material usage rate of the Pre-treatment Wash Primer, in gallons per calendar day.
- The material usage rate of Ful-Thane 2K Urethane, in gallons per calendar day.
- The material usage rate of Ful-Base Topcoat, in gallons per calendar day.
- The material usage rate of Ful-Cryl II Acrylic Enamel, in gallons per calendar day.

The permittee shall collect and maintain records of the following information to demonstrate compliance with Permit Conditions 2.3 and 2.6. The permittee shall perform the required calculations on a monthly basis, using data from the previous 12 months of operation.

- The name and volume of each coating material used, in gallons per month.
- The total of all coating materials used, in gallons per consecutive 12-calendar month period. The total shall be calculated as a rolling 12-calendar month usage rate, and determined on a monthly basis.

For each product used in a coating material, the permittee shall collect and maintain a current copy of the information provided by materials suppliers or manufacturers, such as manufacturer's formulation data, to demonstrate compliance with Permit Condition 2.7. This shall include, but not be limited to:

- The manufacturer name and product number.
- The mass fraction of each toxic air pollutant (TAP), in percent by weight.
- The mass fraction of each hazardous air pollutant (HAP), in percent by weight.
- The mass fraction of volatile organic compounds (VOC), in percent by weight.
- The density, in pounds per gallon.
- The mass fraction solids, in percent by weight.

These requirements are specified in 40 CFR 63, Subpart HHHHHH. Refer to Section 4.7 for additional information.

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Permit Condition 2.12

The permittee shall monitor and record the differential pressure across the spray booth filter system once per day when operating (for any day that a coating operation is performed in the paint spray booth) to demonstrate compliance with Permit Condition 2.9. Records of this information shall be maintained in accordance with General Provision 7.

This condition specifies the monitoring and recordkeeping requirements associated with the spray booth filter system, to demonstrate compliance with permit condition 2.9.

Permit Condition 2.13

The permittee shall maintain records of all odor complaints received, to demonstrate compliance with Permit Condition 2.4. The permittee shall take appropriate corrective action as expeditiously as practicable. The records shall include, at a minimum, the date each complaint was received and a description of the following: the complaint, the permittee's assessment of the complaint, any corrective action taken, and the date the corrective action was taken.

This condition specifies the monitoring and recordkeeping requirements associated with odor complaints, to demonstrate compliance with permit condition 2.4.

Permit Condition 2.14

In accordance with 40 CFR 63.11172(a)(2), on and after the date of initial startup of the affected source the permittee shall comply with the applicable emission limitations and requirements of the National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, 40 CFR 63, Subpart HHHHHH.

- The permittee shall keep the following records in accordance with 40 CFR 63.11177(a) through (d) and (h).
 - Certification that each painter has completed the training specified in 40 CFR 63.11173(f) with the date the initial training and the most recent refresher training was completed.
 - Documentation of the filter efficiency of any spray booth exhaust filter material, according to the procedure in 40 CFR 63.11173(e)(2).
 - Copies of any notification submitted as required by 40 CFR 63.11175 and copies of any report submitted as required by 40 CFR 63.11176.
 - Records of any deviation from the requirements in 40 CFR 63.11173, 63.11174, 63.11175, or 63.11176. These records must include the date and time period of the deviation, and a description of the nature of the deviation and the actions taken to correct the deviation.
 - Records of any assessments of source compliance performed in support of the initial notification, notification of compliance status, or annual notification of changes report.
- The permittee shall maintain copies of the records specified in 40 CFR 63.11177 for a period of at least five years after the date of each record in accordance with 40 CFR 63.11178(a). Copies of records must be kept on site and in a printed or electronic form that is readily accessible for inspection for at least the first two years after their date, and may be kept off-site after that two year period.

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- In accordance with 40 CFR 63.11178(a), the permittee shall maintain copies of the records specified in 40 CFR 63.11177 for a period of at least five years after the date of each record. Copies of records must be kept on site and in a printed or electronic form that is readily accessible for inspection for at least the first two years after their date, and may be kept off-site after that two year period.

These requirements are specified in 40 CFR 63, Subpart HHHHHH. Refer to Section 4.7 for additional information.

Permit Condition 2.15

In accordance with 40 CFR 63.11172(a)(2), on and after the date of initial startup of the affected source the permittee shall comply with the applicable emission limitations and requirements of the National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, 40 CFR 63, Subpart HHHHHH.

- **Initial Notification.** The permittee must submit the initial notification required by 40 CFR 63.9(b) in accordance with 40 CFR 63.11175. For a new affected source, you must submit the Initial Notification no later than 180 days after initial startup or July 7, 2008, whichever is later. The initial notification must provide the following information.
 - The company name, if applicable;
 - The name, title, street address, telephone number, e-mail address (if available), and signature of the owner and operator, or other certifying company official;
 - The street address (physical location) of the affected source and the street address where compliance records are maintained, if different.
 - An identification of the relevant standard, such as 40 CFR part 63, Subpart HHHHHH;
 - A brief description of the type of operation. For all surface coating operations, indicate whether the source is a motor vehicle and mobile equipment surface coating operation or a miscellaneous surface coating operation, and include the number of spray booths and preparation stations, and the number of painters usually employed at the operation.
 - A statement of whether the source is already in compliance with each of the relevant requirements of this subpart, or whether the source will be brought into compliance by the compliance date.
 - The permittee must certify in the initial notification whether the source is in compliance with each of the requirements of 40 CFR 63, Subpart HHHHHH. If the permittee is certifying in the initial notification that the source is in compliance with the relevant requirements of this subpart, then include also a statement by a responsible official with that official's name, title, phone number, e-mail address (if available) and signature, certifying the truth, accuracy, and completeness of the notification, a statement that the source has complied with all the relevant standards of this subpart, and that this initial notification also serves as the notification of compliance status.
- **Notification of Compliance Status.** The permittee is not required to submit a separate notification of compliance status in addition to the initial notification provided the permittee was able to certify compliance on the date of the initial notification, as part of the initial notification, and the permittee's compliance status has not since changed. The permittee must submit a Notification of Compliance Status on or before March 11, 2011. The permittee is required to submit the following information with the Notification of Compliance Status:

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- The company's name and the street address (physical location) of the affected source and the street address where compliance records are maintained, if different.
- The name, title, address, telephone, e-mail address (if available) and signature of the owner and operator, or other certifying company official, certifying the truth, accuracy, and completeness of the notification and a statement of whether the source has complied with all the relevant standards and other requirements of this subpart or an explanation of any noncompliance and a description of corrective actions being taken to achieve compliance. For surface coating operations, the relevant requirements are specified in 40 CFR 63.11173(e) through (g).
- The date of the Notification of Compliance Status.

These requirements are specified in 40 CFR 63, Subpart HHHHHH. Refer to Section 4.7 for additional information.

Permit Condition 2.16

In accordance with 40 CFR 63.11172(a)(2), on and after the date of initial startup of the affected source the permittee shall comply with the applicable emission limitations and requirements of the National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, 40 CFR 63, Subpart HHHHHH.

- Annual Notification of Changes Report. The permittee is required to submit a report in each calendar year in which information previously submitted in either the initial notification required by 40 CFR 63.11175(a), Notification of Compliance, or a previous annual notification of changes report submitted has changed. Deviations from the relevant requirements in 40 CFR 63.11173(a) through (d) or 40 CFR 63.11173(e) through (g) on the date of the report will be deemed to be a change. The annual notification of changes report must be submitted prior to March 1 of each calendar year when reportable changes have occurred and must include the following information.
 - The company's name and the street address (physical location) of the affected source and the street address where compliance records are maintained, if different.
 - The name, title, address, telephone, e-mail address (if available) and signature of the owner and operator, or other certifying company official, certifying the truth, accuracy, and completeness of the notification and a statement of whether the source has complied with all the relevant standards and other requirements of this subpart or an explanation of any noncompliance and a description of corrective actions being taken to achieve compliance.
- Any notifications or reporting required by the National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, 40 CFR 63, Subpart HHHHHH or Subpart A – General Provisions shall be submitted to the following addresses in accordance with 40 CFR 63.13:

EPA Region X
Director, Office of Air Quality
1200 Sixth Avenue
(OAQ-107)
Seattle, WA 98101

&

Air Quality Permit Compliance
Boise Regional Office
Department of Environmental Quality
1445 N. Orchard St.
Boise, ID 83706

Phone: (208) 373-0550

Fax: (208) 373-0287

These requirements are specified in 40 CFR 63, Subpart HHHHHH. Refer to Section 4.7 for additional information.

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5. PERMIT FEES

Table 5.1 lists the processing fee associated with this permitting action. The facility is subject to a processing fee of \$5,000 in accordance with IDAPA 58.01.01.225 because its permitted emissions are between 10 to less than 100 tons per year. Refer to the chronology for fee receipt dates.

Table 5.1 PTC PROCESSING FEE TABLE

Emissions Inventory			
Pollutant	Annual Emissions Increase (T/yr)	Annual Emissions Reduction (T/yr)	Annual Emissions Change (T/yr)
PM ₁₀	0.21	0	0.21
SO ₂	0.01	0	0.01
NO _x	0.82	0	0.82
CO	0.35	0	0.35
VOC	24.49	0	24.49
HAP ^{1,2}	0.00	0	0.00
Total^{1,2}:	25.88	0	25.88
Fee Due	\$5,000.00		

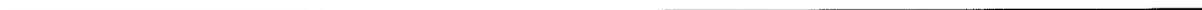
¹ For the purposes of fee calculation, HAP emissions from PM₁₀ are included in the PM₁₀ emissions total, and are therefore not included in the HAP emissions total.

² For the purposes of fee calculation, HAP emissions from VOC are included in the VOC emissions total, and are therefore not included in the HAP emissions total.

6. PUBLIC COMMENT

An opportunity for public comment period on the PTC application was provided in accordance with IDAPA 58.01.01.209.01.c. During this time, there was no comment on the application and no request for a public comment period on DEQ's proposed action. Refer to the chronology for comment period opportunity dates.

Appendix A – AIRS Information



AIRS/AFS^a FACILITY-WIDE CLASSIFICATION^b DATA ENTRY FORM

**Permittee/
 Facility Name:** Maaco Collision Repair and Auto Center
Facility Location: Meridian, Idaho
AIRS Number: 001-00223

AIR PROGRAM POLLUTANT	SIP	PSD	NSPS (Part 60)	NESHAP (Part 61)	MACT (Part 63)	SM80	TITLE V	AREA CLASSIFICATION
								A-Attainment U-Unclassified N- Nonattainment
SO ₂	B							U
NO _x	B							U
CO	B							A
PM ₁₀	B							A
PT (Particulate)	B							A
VOC	SM							U
THAP (Total HAPs)	SM				SM	X		---
			APPLICABLE SUBPART					
					A, HHHHHH			

^a Aerometric Information Retrieval System (AIRS) Facility Subsystem (AFS)

^b AIRS/AFS Classification Codes:

- A = Actual or potential emissions of a pollutant are above the applicable major source threshold. For HAP only, class "A" is applied to each pollutant which is at or above the 10 T/yr threshold, or each pollutant that is below the 10 T/yr threshold, but contributes to a plant total in excess of 25 T/yr of all HAP.
- SM = Potential emissions fall below applicable major source thresholds if and only if the source complies with federally enforceable regulations or limitations.
- B = Actual and potential emissions below all applicable major source thresholds.
- C = Class is unknown.
- ND = Major source thresholds are not defined (e.g., radionuclides).

Appendix B – Emissions Inventory



Table 3A. VOC Emissions

Both controlled and uncontrolled PTE
No VOC control in booth

Product Type	Maximum Gun Throughput (gal/hr)	LE VOC content (# VOC/gal coating)	Potential hours per year	Potential Emissions (lbs/hr)	Potential Emissions (tons/year)
Wash Thinner (cleanup)	3.75	6.9	8760	25.875	113.33
Total:					113.33

Note: The Wash Thinner is the worst case VOC use and the maximum spray gun application is 3.75 gallons per hour.

Limited Actual Worst Case Emissions

Product Type	Maximum Gun Throughput (gal/hr)	Gallons per year (gal/yr)	LE VOC content (# VOC/gal coating)	Potential Emissions (lbs/yr)	Potential Emissions (tons/year)
Wash Thinner (cleanup)	3.75	5000	6.9	34500	17.25
Total:					17.25

MAACO ENTERPRISES

Table 5A. Worst Case Potential Particulate Emission Calculations

Before Control

A Product Type	B Maximum Gun Throughput (gal/hr)	C Percent Overspray	D solids content (# solids/gal coating)	E=B*C*D Potential Emissions (lb/hr)	F=E*8760/2000 Potential Emissions (tpy)
Primer/Primer Surface	3.75	35%	7.97	10.46	45.81

After Control (98% filter efficiency and 5000 gal/yr)

A Product Type	B Maximum Gun Throughput (gal/yr)	C Percent Overspray	D solids content (# solids/gal coating)	E=B*C*D Potential Emissions (lb/yr)	F Control Efficiency (%)	G=E*(1-F) Controlled Emissions (lb/yr)	H=G/2000 Potential Emissions (tpy)
Primer/Primer Surface	5000	35%	7.97	13945.53	0.98	278.91	0.14

	Potential Emissions (lb/hr)	Controlled Emissions (lb/hr)
Primer/Primer Surface	10.46	0.21

Please note, the Primer/Primer Surface has the largest solids content. It is used for the potential worst case particulate calculation.

Table 7A.

**Garmat Tier 1 Booth and Oven Emissions
Criteria Pollutants
Emission Factors for Natural Gas from EPA's AP-42**

	Burners (2) 997000 Btu Potential Emissions	
	(lb/hr)	(ton/yr)
Particulate	0.02	0.07
NOx	0.19	0.82
SOx	0.0012	0.005
CO	0.080	0.350
VOC	0.01	0.05
	(lb/qtr)	
Lead	1.07E-03	

Table 4A. Regulated Toxic Analysis

Coating/Regulated Toxic	Parts	Product	Subproduct	Product #	Maximum Gun Capacity (gal/hr)	% BW in product	Density (lb/gal)	VOC (b/gal)	potential (hrs/day)	potential emissions (lb/day)
Topcoats										
			Topcoat (1/3)	430-XX			10.585	5.2		
			Binder (2/3)	435-90			7.73	4.1		
	8	Ful-Base Enamel					8.68	4.47		
	1	Catalyst Plus		483-08			8.16	4.9		
	2	Reducer		441-XX			7.515	7.4		
Ful-Base Topcoat					3.750		8.42	5.0	24.00	
1,2,4 trimethyl benzene						0.6730%				5.10
acetone						22.7899%				172.75
acrylic polymer						4.4024%				33.37
alkyd resin						19.0594%				144.47
aromatic hydrocarbon						2.6488%				20.08
butyl acetate						18.7064%				141.79
cobalt neodecanoate						0.0582%				0.44
ethylene glycol monobutyl ether acetate						1.4545%				11.03
ethyl 3-ethoxy propionate						7.6285%				57.82
ethyl benzene						2.3176%				17.57
heptane						5.6473%				42.81
isophorone diisocyanate						0.0364%				0.28
isophorone diisocyanate homopolymer						2.9891%				22.66
medium mineral spirits						4.2036%				31.86
napthalene						6.5471%				49.63
n-hexane						0.3039%				2.30
polyester resin						2.6303%				19.94
primary amyl acetate						0.2424%				1.84
quinacridone pigment						1.4133%				10.71
silicon dioxide						0.2424%				1.84
toluene						3.5289%				26.75
VM&P naptha						5.8518%				44.36
xylene						8.3085%				62.98
Topcoats										
			Topcoat (1/3)	430-XX			10.585	5.2		
			Binder (2/3)	435-94			7.98	4.8		
	8	Ful-Cryl II					8.85	4.9		
	1	Catalyst		483-11			9.01	2.2		
	2	Reducer		441-XX			7.515	7.4		
Ful-Cryl II Acrylic Enamel					3.750		8.62	5.1	24.0	
1,2,4 trimethyl benzene						0.6682%				5.18
1,6-hexamethylene diisocyanate						0.0127%				0.10
acetone						15.4542%				119.90
acrylic polymer						9.9491%				77.19
aliphatic polyisocyanate resin						6.8382%				53.05
aromatic hydrocarbon						0.8618%				6.69
butyl acetate						15.1912%				117.86
ethylene glycol monobutyl ether acetate						2.3294%				18.07
ethyl 3-ethoxy propionate						9.5976%				74.46
ethyl benzene						2.7685%				21.48
heptane						5.6473%				43.81
methyl amyl ketone						5.9941%				46.51
methyl isobutyl ketone						0.5624%				4.36
n-hexane						0.3039%				2.36
polyester resin						16.4048%				127.28
propylene glycol monomethyl ether acetate						0.4536%				3.52
quinacridone pigment						1.4133%				10.97
silicon dioxide						0.2424%				1.88
toluene						4.9692%				38.55
VM&P naptha						6.4336%				49.92
xylene						10.5921%				82.18

		Toner (1/3)	430-XX			10 585	5.2		
		Binder (2/3)	435-91			8.11	4.6		
	8	Ful-Base System Toner				8.94	4 80		
	1	Catalyst	483-15			9.35	0.9		
	2	Reducer	441-XX			7 515	7.4		
Ful-Thane 2K Urethane					3.750	8.71	4 92	24.00	
1,2,4-trimethyl benzene						0.6955%			5.45
1,6-hexamethylene diisocyanate						0.0182%			0.14
acetone						15.4542%			121.21
acrylic polymer						7.3842%			57.92
aliphatic polyisocyanate resin						8.1664%			64.05
aromatic hydrocarbon						0.9045%			7.09
butyl acetate						13.8767%			108.84
ethylene glycol monobutyl ether acetate						1.4545%			11.41
ethyl 3-ethoxy propionate						7.2897%			57.17
ethyl acetate						2.1818%			17.11
ethyl benzene						2.5600%			20.08
heptane						8.2461%			64.67
methyl isobutyl ketone						0.7370%			5.78
n-hexane						0.3039%			2.38
polyester resin						19.2558%			151.02
primary amyl acetate						0.2424%			1.90
propylene glycol monomethyl ether acetate						6.8558%			53.77
quinacridone pigment						1.4133%			11.08
silicon dioxide						0.2424%			1.90
substituted benzotriazole						0.5382%			4.22
toluene						4.9835%			39.09
VM&P naptha						4.1936%			32.89
xylene						9.3164%			73.07

	0.041128	chromabase tint	814J			9.15	4.7		
	0.086892	chromabase tint	806J			8.25	4.3		
	0.097421	chromabase tint	811J			9.25	4.9		
	0.130769	chromabase tint	827J			7.94	5.6		
	0.142279	chromabase tint	820J			7.96	5.2		
	0.139017	chromabase tint	802J			8.58	4.0		
	0.362495	balancer	150K			7.29	6.6		
	1	K8620K				8.00	5.46		
	1	Basemaker	7160S			6.61	6.6		
	1	Chromabase Basecoat				7.31	6 03		
	4	Clear	496-00			7.98	4.2		
	1	Catalyst	483-79			8.36	4.7		
	2	Clearcoat				8.06	4 30		
Chromabase Basecoat/Clearcoat					3.750	7.81	4 88	24.00	
1,2,4 tri methyl benzene						1.4577%			10.24
acetone						13.0027%			91.35
aluminum						0.5798%			4.07
butyl acetate						5.2010%			36.54
heptane						4.7067%			33.07
hexane						0.2050%			1.44
isopropyl alcohol						1.5217%			10.69
toluene						2.0791%			14.61
xylene						16.2843%			114.40

Chromabase Basecoat/Clearcoat

(Additional regulated toxics)

	1 Honda Gray Blue	K8620K				8	5.46		
	1 Chromasystem Basemaker	7160				7.31	6.03		
	4 Clear	496-00				7.98	4.2		
	1 Catalyst	483-79				8.36	4.7		
					3.75	7.862	5.574	24.00	
	1,2,4-trimethyl benzene					1.44%			10.217
	1,3,5-trimethyl benzene					0.33%			2.321
	acetone					13.00%			92.004
	acrylic polymer					18.76%			132.761
	aliphatic polyisocyanate resin					5.85%			41.389
	aluminum					0.00%			0.000
	aromatic hydrocarbon					2.27%			16.048
	butyl acetate					5.20%			36.801
	carbon black					0.00%			0.000
	cellulose acetate butyrate					0.67%			4.717
	ethyl 3-ethoxy propionate					1.97%			13.953
	ethyl benzene					3.12%			22.076
	ethylene glycol monobutyl ether acetate					0.80%			5.670
	heptane					4.71%			33.303
	isopropyl alcohol					1.52%			10.767
	methyl amyl ketone					1.92%			13.586
	methyl ethyl ketone					4.92%			34.837
	n-hexane					0.21%			1.451
	polyethylene/vinyl acetate					0.44%			3.137
	propionic acid, n-butyl ester					3.05%			21.581
	propyl benzene					0.17%			1.236
	p-toluenesulfonyl isocyanate					0.02%			0.142
	stoddard solvent					0.00%			0.000
	toluene					2.40%			16.970
	xylene					12.33%			87.23

Wash Thinner

481-16 Nason Select Thinner			481-16	3.75		6.78	6.9	24	
acetone						37.0%			225.77
ethyl benzene						0.8%			4.88
methyl alcohol						20.0%			122.04
toluene						30.0%			183.06
VM&P naptha						15.0%			91.53
xylene						3.0%			18.31

INDIVIDUAL REGULATED TOXIC SUBTOTAL	CAS	Individual Toxic	Potential	Potential	5000 gal/yr	Screening Emission Levels		Below EL?
		Worst Case	Before Control	Before Control	Potential	(lb/hr)	% EL	
		Potential Emissions	Emissions	(tpy)	After Control			
		(lb/day)	(lb/hr)		(tpy)			
1,2,4-Trimethylbenzene	95-63-6	10.24	0.427	1.8689	0.2845	8.2	5.2%	Yes
1,3,5-trimethyl benzene	108-67-8	2.3209	0.097	0.4236	0.0645	8.2	1.2%	Yes
1,6-hexamethylene diisocyanate	822-06-0	0.1426	0.006	0.026025	0.0040	0.002	297.1%	No
acetone	67-64-1	225.7740	9.407	41.2038	6.2715	119	7.9%	Yes
aluminum	7429-90-5	4.0733	0.170	0.7434	0.1131	0.667	25.4%	Yes
butyl acetate	123-86-4	198.0274	8.251	36.1400	5.5008	47.3	17.4%	Yes
ethyl acetate	141-78-6	65.6651	2.736	11.9839	1.8240	93.3	2.9%	Yes
ethyl alcohol	64-17-5	110.0515	4.585	20.0844	3.0570	125	3.7%	Yes
ethyl benzene	100-41-4	62.2664	2.594	11.3636	1.7296	29	8.9%	Yes
heptane	142-82-5	64.6746	2.695	11.8031	1.7965	109	2.5%	Yes
isopropyl alcohol	67-63-0	10.7670	0.449	1.9650	0.2991	65.3	0.7%	Yes
isophorone diisocyanate	4098719	0.2756	0.011	0.0503	0.0077	0.006	191.4%	No
methyl alcohol	67-56-1	122.0400	5.085	22.2723	3.3900	17.3	29.4%	Yes
methyl amyl ketone	110-43-0	46.5057	1.938	8.4873	1.2918	15.7	12.3%	Yes
methyl ethyl ketone	78-93-3	109.2007	4.550	19.9291	3.0334	39.3	11.6%	Yes
methyl isobutyl ketone	108-10-1	45.0889	1.879	8.2287	1.2525	13.7	13.7%	Yes
naphthalene	91-20-3	49.6262	2.068	9.0568	1.3785	3.33	62.1%	Yes
n-butyl alcohol	71-36-3	284.5014	11.854	51.9215	7.9028	10	118.5%	No
n-hexane	110-54-3	2.3833	0.099	0.4350	0.0662	12	0.8%	Yes
phosphoric acid	7664382	7.7345	0.322	1.4115	0.2148	0.067	481.0%	No
primary amyl acetate	628637	1.9014	0.079	0.3470	0.0528	35.3	0.2%	Yes
propylene glycol monomethyl ether acetate	108656	53.7703	2.240	9.8131	1.4936	24	9.3%	Yes
silica, silicon dioxide		43.5986	1.817	7.9567	1.2111	0.667	272.4%	No
stoddard solvent	8052-41-3	0.0000	0.000	0.0000	0.0000	35	0.0%	Yes
toluene	108-88-3	183.0600	7.628	33.4085	5.0850	25	30.5%	Yes
VM&P naptha	8032324	91.5300	3.814	16.7042	2.5425	91.3	4.2%	Yes
xylene	1330-20-7	224.3603	9.348	40.9458	6.2322	29	32.2%	Yes

	PTE	Limited
TOTAL HAPS PTE	159	24
INDIVIDUAL HAPS PTE	52	8

In order for the total HAPS to be 24.5 tpy, a ratio of 17% is used. Therefore, a limitation on the total amount of paint is reduced from (3.75 gal/hr x 8760 hours/year) 32850 gallons per year to 5,000 gallons per year.

Table 4B. Regulated Toxic Analysis (limitations)

Coating/Regulated Toxic	Parts	Product	Subproduct	Product #	Maximum Gun Capacity (gal/hr)	% BW in product	Density (lb/gal)	VOC (lb/gal)	potential (hrs/day)	potential emissions (lb/day)
Topcoats										
			Topcoat (1/3)	430-XX			10.585	5.2		
			Binder (2/3)	435-90			7.73	4.1		
	8	Ful-Base Enamel					8.68	4.47		
	1	Catalyst Plus		483-08			8.16	4.9		
	2	Reducer		441-XX			7.515	7.4		
Ful-Base Topcoat					2.000		8.42	5.0	12.00	
1,2,4 trimethyl benzene						0.6730%				1.36
acetone						22.7899%				46.07
acrylic polymer						4.4024%				8.90
alkyd resin						19.0594%				38.52
aromatic hydrocarbon						2.6488%				5.35
butyl acetate						18.7064%				37.81
cobalt neodecanoate						0.0582%				0.12
ethylene glycol monobutyl ether acetate						1.4545%				2.94
ethyl 3-ethoxy propionate						7.6285%				15.42
ethyl benzene						2.3176%				4.68
heptane						5.6473%				11.41
isophorone diisocyanate						0.0364%				0.07
isophorone diisocyanate homopolymer						2.9891%				6.04
medium mineral spirits						4.2036%				8.50
naphthalene						6.5471%				13.23
n-hexane						0.3039%				0.61
polyester resin						2.6303%				5.32
primary amyl acetate						0.2424%				0.49
quinacridone pigment						1.4133%				2.86
silicon dioxide						0.2424%				0.49
toluene						3.5289%				7.13
VM&P naptha						5.8518%				11.83
xylene						8.3085%				16.79
			Topcoat (1/3)	430-XX			10.585	5.2		
			Binder (2/3)	435-94			7.98	4.8		
	8	Ful-Cryl II					8.85	4.9		
	1	Catalyst		483-11			9.01	2.2		
	2	Reducer		441-XX			7.515	7.4		
Ful-Cryl II Acrylic Enamel					3.000		8.62	5.1	12.0	
1,2,4 trimethyl benzene						0.6682%				2.07
1,6-hexamethylene diisocyanate						0.0127%				0.0395
acetone						15.4542%				47.96
acrylic polymer						9.9491%				30.88
aliphatic polyisocyanate resin						6.8382%				21.22
aromatic hydrocarbon						0.8618%				2.67
butyl acetate						15.1912%				47.14
ethylene glycol monobutyl ether acetate						2.3294%				7.23
ethyl 3-ethoxy propionate						9.5976%				29.79
ethyl benzene						2.7685%				8.59
heptane						5.6473%				17.53
me hyl amyl ketone						5.9941%				18.60
me hyl isobutyl ketone						0.5624%				1.75
n-hexane						0.3039%				0.94
polyester resin						16.4048%				50.91
propylene glycol monomethyl ether acetate						0.4536%				1.41
quinacridone pigment						1.4133%				4.39
silicon dioxide						0.2424%				0.75
toluene						4.9692%				15.42
VM&P naptha						6.4336%				19.97
xylene						10.5921%				32.87

		Toner (1/3)	430-XX			10.585	5.2		
		Binder (2/3)	435-91			8.11	4.6		
	8	Ful-Base System Toner				8.94	4.80		
	1	Catalyst	483-15			9.35	0.9		
	2	Reducer	441-XX			7.515	7.4		
Ful-Thane 2K Urethane				2 000		8.71	4.92	12.00	
1,2,4-trimethyl benzene					0.6955%				1.45
1,6-hexamethylene diisocyanate					0.0182%				0.0380
acetone					15.4542%				32.32
acrylic polymer					7.3842%				15.44
aliphatic polyisocyanate resin					8.1664%				17.08
aromatic hydrocarbon					0.9045%				1.89
butyl acetate					13.8767%				29.02
ethylene glycol monobutyl ether acetate					1.4545%				3.04
ethyl 3-ethoxy propionate					7.2897%				15.25
ethyl acetate					2.1818%				4.56
ethyl benzene					2.5600%				5.35
heptane					8.2461%				17.25
me hyl isobutyl ketone					0.7370%				1.54
n-hexane					0.3039%				0.64
polyester resin					19.2558%				40.27
primary amyl acetate					0.2424%				0.51
propylene glycol monomethyl ether acetate					6.8558%				14.34
quinacridone pigment					1.4133%				2.96
silicon dioxide					0.2424%				0.51
substituted benzotriazole					0.5382%				1.13
toluene					4.9835%				10.42
VM&P naptha					4.1936%				8.77
xylene					9.3164%				19.49

	0.041128	chromabase tint	814J			9.15	4.7		
	0.086892	chromabase tint	806J			8.25	4.3		
	0.097421	chromabase tint	811J			9.25	4.9		
	0.130769	chromabase tint	827J			7.94	5.6		
	0.142279	chromabase tint	820J			7.96	5.2		
	0.139017	chromabase tint	802J			8.58	4.0		
	0.362495	balancer	150K			7.29	6.6		
	1	K8620K				8.00	5.46		
	1	Basemaker	7160S			6.61	6.6		
	1	Chromabase Basecoat				7.31	6.03		
	4	Clear	496-00			7.98	4.2		
	1	Catalyst	483-79			8.36	4.7		
	2	Clearcoat				8.06	4.30		
Chromabase Basecoat/Clearcoat				3.750		7.81	4.88	12.00	
1,2,4 tri methyl benzene					1.4577%				5.12
acetone					13.0027%				45.67
aluminum					0.5798%				2.04
butyl acetate					5.2010%				18.27
heptane					4.7067%				16.53
hexane					0.2050%				0.72
isopropyl alcohol					1.5217%				5.35
toluene					2.0791%				7.30
xylene					16.2843%				57.20

Pretreatment Wash Primer

Proposed product limitation (0.5 gallons per hour or 12 gallons per day or 3120 gallons per year)

	1	Etch Primer	491-17			7.90	5.70		
	1	Activator	441-XX			7.52	7.40		
Etch Primer				1 000		7.71	6.55	12	
butylated phenol-formaldehyde resin					2.86%				2.65
carbon black					0.06%				0.06
ethyl alcohol					15.87%				14.67
me hyl ethyl ketone					15.74%				14.56
me hyl isobutyl ketone					6.50%				6.01
n-butyl alcohol					41.01%				37.93
phosphoric acid					1.12%				1.03
polyvinyl butyl resin					3.67%				3.39
titanium dioxide					1.85%				1.71
water					0.87%				0.80
zinc chromate					4.50%				4.16

Prime Sealer

422-23 Ful-Seal Select			422-XX	3.75		9.855	4.6	12	
ethyl benzene					5.6%				24.83
naphthalene					0.3%				1.43
silicon dioxide					1.9%				8.53
toluene					4.2%				18.54
xylene					2.7%				11.97

Primer Surface

	4	SelectPrime 2K Primer	421-XX			11.675	4.6		Solids (lb/gal)
	1	SelectPrime Activator	483-87			8.01	5.3		9.27
2K Urethane Primer				3.75		10.942	4.74	12.00	7.97
acrylic polymer					12.66%				62.356
aliphatic polyisocyanate resin					6.82%				33.601
barium sulfate					7.05%				34.704
butyl acetate					20.11%				99.014
ethyl acetate					6.67%				32.833
ethyl benzene					6.32%				31.133
hydrous magnesium silicate					10.57%				52.036
me hyl amyl ketone					2.62%				12.920
me hyl ethyl ketone					4.52%				22.256
propylene glycol monomethyl ether acetate					2.88%				14.181
p-toluenesulfonyl isocyanate					0.03%				0.148
titanium dioxide					12.65%				62.277
silicon dioxide					4.43%				21.799
toluene					13.62%				67.085
xylene					22.78%				112.18
yellow iron oxide					3.25%				15.993
zinc phosphate					1.58%				7.760

Chromabase Basecoat/Clearcoat

(Additional regulated toxics)

	1 Honda Gray Blue	K8620K			8	5.46			
	1 Chromasystem Basemaker	7160			7.31	6.03			
	4 Clear	496-00			7.98	4.2			
	1 Catalyst	483-79			8.36	4.7			
				3.75		7.862	5.574	12.00	
	1,2,4-trimethyl benzene				1.44%				5.109
	1,3,5-trimethyl benzene				0.33%				1.160
	acetone				13.00%				46.002
	acrylic polymer				18.76%				66.380
	aliphatic polyisocyanate resin				5.85%				20.694
	aluminum				0.00%				0.000
	aromatic hydrocarbon				2.27%				8.024
	butyl acetate				5.20%				18.401
	carbon black				0.00%				0.000
	cellulose acetate butyrate				0.67%				2.359
	ethyl 3-ethoxy propionate				1.97%				6.977
	ethyl benzene				3.12%				11.038
	ethylene glycol monobutyl ether acetate				0.80%				2.835
	heptane				4.71%				16.652
	isopropyl alcohol				1.52%				5.384
	me hyl amyl ketone				1.92%				6.793
	me hyl ethyl ketone				4.92%				17.418
	n-hexane				0.21%				0.725
	polyethylene/vinyl acetate				0.44%				1.568
	propionic acid, n-butyl ester				3.05%				10.791
	propyl benzene				0.17%				0.618
	p-toluenesulfonyl isocyanate				0.02%				0.071
	stoddard solvent				0.00%				0.000
	toluene				2.40%				8.485
	xylene				12.33%				43.62

Wash Thinner

481-16 Nason Select Thinner			481-16	3.75		6.78	6.9	12	
acetone					37.0%				112.89
ethyl benzene					0.8%				2.44
me hyl alcohol					20.0%				61.02
toluene					30.0%				91.53
VM&P naptha					15.0%				45.77
xylene					3.0%				9.15

INDIVIDUAL REGULATED TOXIC SUBTOTAL	CAS	Individual Toxic		Screening Emission Levels		Below EL?
		Worst Case Potential Emissions (lb/day)	Controlled Emissions (lb/hr)	(lb/hr)	% EL	
1,2,4-Trimethylbenzene	95-63-6	5.12	0.213	8.2	2.6%	Yes
1,3,5-trimethyl benzene	108-67-8	1.1604	0.048	8.2	0.6%	Yes
1,6-hexamethylene diisocyanate	822-06-0	0.0395	0.002	0.002	82.3%	Yes
ethyl benzene	100-41-4	31.1332	1.297	29	4.5%	Yes
isophorone diisocyanate	4098719	0.0735	0.003	0.006	51.0%	Yes
methyl alcohol	67-56-1	61.0200	2.543	17.3	14.7%	Yes
methyl isobutyl ketone	108-10-1	6.0119	0.250	13.7	1.8%	Yes
naphthalene	91-20-3	13.2337	0.551	3.33	16.6%	Yes
n-butyl alcohol	71-36-3	37.9335	1.581	10	15.8%	Yes
n-hexane	110-54-3	0.9431	0.039	12	0.3%	Yes
phosphoric acid	7664382	1.0313	0.043	0.067	64.1%	Yes
silica, silicon dioxide ¹		21.7993	0.454	0.667	68.1%	Yes
toluene	108-88-3	91.5300	3.814	25	15.3%	Yes
xylene	1330-20-7	112.1801	4.674	29	16.1%	Yes

¹ assuming a conservative 50% capture efficiency of silica particulate by the filters